## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: James Ottis Wilks, Debtor Case No. 18-00308-JAW CHAPTER 13

## **RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Creditor, MidFirst Bank's Motion to Approve Loan Modification (dk # 75) as follows:

- 1. Debtor commenced this case on 01/31/2018 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
- 2. Debtor does not wish to pursue the loan modification.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367) The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 trollins@therollinsfirm.com 601-500-5533

## **CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 9, 2022, to:

By Electronic CM/ECF Notice:

Eric C. Miller, attorney for Creditor

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.